

LAGOMARSINO LAW

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aml@lagomarsinolaw.comcory@lagomarsinolaw.com*Attorneys for Plaintiff Parnell Jay Fair***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

PARNELL JAY FAIR, individually,

Plaintiff,

v.

LUKAS TURLEY, individually; ALEXANDER
RYNDAK, individually;

Defendants.

CASE NO.: 2:20-cv-01841-JCM-BNW

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR FILING OPPOSITIONS
TO MOTIONS FOR SUMMARY
JUDGMENT (ECF NO. 128 & 129)****(First Request)**

Plaintiff PARNELL JAY FAIR (“Plaintiff”) and Defendants LUKAS TURLEY and ALEXANDER RYNDIAK (“Defendants”) (collectively “the Parties”), by and through their respective counsel, hereby stipulate and agree that the deadline for Plaintiff file his Opposition to (1) *Defendant Lukas Turley’s Motion for Summary Judgment* (ECF No. 128) and (2) *Defendant Alexander Ryndak’s Motion for Summary Judgment* (ECF No. 129) (the “Motions”) shall be extended to May 17, 2023.

On April 12, 2023, Defendants filed their Motions (ECF No. 128 & 129). Plaintiff’s Oppositions are currently due on May 3, 2023. However, handling attorney for Plaintiff has a full day deposition scheduled as well as a full day mediation in other matters next week. Additionally, the other two attorneys at the handling attorney’s office for Plaintiff are currently out of town for several days. This has resulted in handling attorney for Plaintiff taking on additional duties and tasks

1 while they are gone. Therefore, the Parties stipulate, and request, an extension up to, and
2 including, May 17, 2023 for Plaintiff to file his Oppositions to the Motions.

3 This is the first request seeking an extension of the deadline for Plaintiff to respond
4 to Defendants' Motions. This request is made in good faith and is not for the purpose of delay.

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6 DATED this 21st day of April, 2023.

DATED this 21st day of April, 2023.

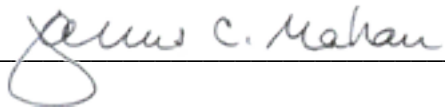
7 **LAGOMARSINO LAW**

KAEMPFER CROWELL

8 /s/ Cory M. Ford
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Attorneys for Defendants
Lukas Turley and Alexander Ryndak

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15 **IT IS SO ORDERED.**

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18 UNITED STATES DISTRICT COURT JUDGE

19 DATED: April 21, 2023
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